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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

Re: E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

SBC Communications Inc. (SBC) submits this letter to update the Commission on the measures it has taken to ensure that its Voice over Internet Protocol (VoIP) service, known as PremierSERV Hosted IP Communications Service (HIPCS), satisfies the Commission's VoIP 911 rules.¹ HIPCS is a next-generation VoIP information service designed for business customers, which combines voice and data communications on a single network, giving subscribers personalized control, simplified management, potential cost savings and advanced applications. Among other things, HIPCS enables subscribers to make calls to, and receive calls from, the public switched telephone network. HIPCS also enables subscribers to make calls to, and receive calls from, customers of other VoIP services.

When entering into an agreement with SBC for HIPCS, a HIPCS subscriber is required to identify the registered locations where it seeks service (e.g., office building(s) located in one or more cities). Before activating HIPCS for a subscriber, SBC provisions 911 service to each of the subscriber's registered locations by obtaining the necessary trunking to the appropriate selective routers; making arrangements with the appropriate Public Safety Answering Points (PSAPs) for the delivery of VoIP traffic; and entering an automatic location information (ALI) record for each of the HIPCS subscriber's registered locations into the relevant ALI database for later retrieval by ALI-capable PSAPs. Once HIPCS is activated, a HIPCS subscriber's end users can make 911 calls from any of the subscriber's registered locations where HIPCS has been provisioned by SBC.

¹ See 47 C.F.R. § 9; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (released June 3, 2005). HIPCS is actually provided to subscribers by SBC affiliates; for simplicity, however, we refer to HIPCS as being provided by SBC in this letter.

A HIPCS subscriber's end user can take his or her IP phone from a location in one city to a location in another city and still have the capability to place a 911 call, as long as both locations have been provisioned as registered HIPCS locations for the end user.² When the end user connects the IP phone at the registered location in the new city, the HIPCS network automatically recognizes this change and routes any 911 calls from this IP phone to the appropriate PSAP in the new city. Thus, there is no need for the end user to manually update his or her location information when moving between registered HIPCS locations. Due to the manner in which HIPCS is designed and the security features built into HIPCS (i.e., a HIPCS firewall), the HIPCS network will only allow an IP phone (or TA) to be used from a registered location where HIPCS has been provisioned by SBC. Thus, the HIPCS network does not enable a subscriber's end user to use an IP phone (or TA) over a broadband connection from a non-registered location.

SBC supports the Commission's efforts to ensure that VoIP services are offered with 911 capability and, as described above, we have deployed 911 service to all of our HIPCS subscribers in a manner that we believe meets or exceeds the Commission's VoIP 911 rules. We look forward to working with the Commission and other public safety stakeholders to address the challenges of providing 911 service as communications technologies continue to evolve.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/

James C. Smith

² HIPCS subscribers have the option of using an IP phone or a standard telephone connected to a terminal adapter (TA). The routing of a 911 call is not affected by whether the subscriber chooses an IP phone or a TA.